



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

Muriel Goode-Trufant
Corporation Counsel

Taylor Anvid
phone: (212) 356-2196
email: tanvid@law.nyc.gov

February 14, 2025

By ECF

The Honorable Naomi R. Buchwald
United States District Judge
United States District Court, Southern District of New York
40 Foley Square
New York, New York 10007


Re: Heather Josephine Jansen v. City of New York, et al., 1:24-cv-00347 (NRB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants City of New York (“City”), New York City Department of Sanitation (“DSNY”), the New York City Police Department (“NYPD”), NYPD Police Commissioner Edward Caban and DSNY Commissioner Jessica Tisch in their official capacities, (collectively “City Defendants”) in the above-referenced action. This letter is being submitted jointly with plaintiff to update the Court on the progress of discovery.

We can report that both sides have exchanged their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). In addition, both sides have served their initial sets of interrogatories and/or document demands, which are currently due to be responded to today, February 14, 2025. The parties anticipate commencing rolling document productions in the coming weeks, with an eye toward beginning to schedule depositions. The parties are continuing to meet and confer concerning discovery issues as they arise, and have no ripe disputes or requests to present to the Court at this time.

Respectfully submitted,


Taylor Anvid
Assistant Corporation Counsel